

CRIMINAL COMPLAINT
(Electronically Submitted)

United States District Court	DISTRICT of ARIZONA
United States of America v. Sterling Lee Runyon ; DOB: 1991; United States Halston D Oir Washington ; DOB: 1989; United States	DOCKET NO.
Complaint for violation of Title 8 United States Code § 1324(a)(1)(A)(ii), 1324(a)(1)(A)(v)(I) and 1324(a)(1)(B)(i)	MAGISTRATE'S CASE NO. 24-05369MJ

COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:

On or about December 7, 2024, in the District of Arizona, **Sterling Lee Runyon** and **Halston D Oir Washington**, named herein as defendants and conspirators, did knowingly and intentionally combine, conspire, confederate, and agree with each other and other persons, known and unknown, to transport certain illegal aliens, including Jovani Alejandro Gonzalez-Mejia and Lizbeth Jimenez-Hernandez, and did so for the purpose of private financial gain; in violation of **Title 8, United States Code, Sections 1324(a)(1)(A)(ii), 1324(a)(1)(A)(v)(I) and 1324(a)(1)(B)(i)**.

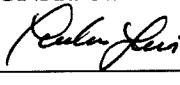
BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:

On or about December 7, 2024, in the District of Arizona (Whetstone), a United States Border Patrol Agent (BPA) observed a 2010 Chrysler Town and Country pass his location traveling northbound on State Route (SR) 90. The van appeared heavily laden with the rear riding much lower than the front. The BPA noticed the driver, front seat passenger, and a temporary license plate. The BPA followed behind and requested record checks. The registration returned to a used car company out of Phoenix, Arizona. The BPA noticed a large open area in the van to where seats may have been removed and decided to conduct a stop. Multiple people in the back area without seats sat up into view and began moving around. The driver was identified as **Sterling Lee Runyon**, and the front seat passenger was identified as **Halston D Oir Washington**. The BPA observed four passengers in the back area with camouflage carpet booties on the floor. The four passengers including Jovani Alejandro Gonzalez-Mejia and Lizbeth Jimenez-Hernandez were determined to be Mexican citizens illegally present in the United States. BPAs discovered 53 grams of marijuana and 15 grams of THC wax inside a backpack in the van.

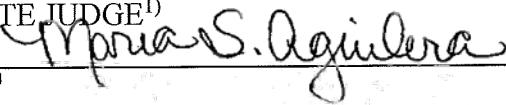
Records checks revealed that Jovani Alejandro Gonzalez-Mejia and Lizbeth Jimenez-Hernandez did not have the proper immigration documentation to enter or remain in the U.S. legally. Gonzalez was previously removed from the U.S. on November 27, 2024.

Continued on the next page:

MATERIAL WITNESSES IN RELATION TO THE CHARGE: Jovani Alejandro Gonzalez-Mejia and Lizbeth Jimenez-Hernandez

Detention Requested <i>Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.</i>	SIGNATURE OF COMPLAINANT 
	OFFICIAL TITLE Border Patrol Agent

Sworn by telephone x

SIGNATURE OF MAGISTRATE/JUDGE ¹⁾ 	DATE December 9, 2024
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¹⁾ See Federal Rules of Criminal Procedure Rule 3, 4.1, and 54

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Material witness Jovani Alejandro Gonzalez-Mejia stated that he is a citizen of Mexico and his cousin had arranged for him to be smuggled into the United States for 230,000 Mexican Pesos. Gonzalez crossed the International Boundary Fence (IBF) and walked through the desert to a paved road guided by cellphone. At the road a guide told Gonzalez and others to wait for a white vehicle. A gray or white van arrived and stopped with its side door open. The group ran and entered the vehicle. The driver and front seat passenger made hand gestures for them to get and stay low while inside the vehicle. Gonzalez rode for approximately one hour and 45 minutes until they were apprehended by Border Patrol. He described the driver as a young white male wearing a ball cap and white t-shirt. Gonzalez described the passenger as a young black male wearing a dark blue sweater and ball cap.

Material witness Lizbeth Jimenez-Hernandez stated that she is a citizen of Mexico and her family had arranged for her to be smuggled into the United States for an unknown amount of money. Jimenez crossed the IBF and walked through the desert to a paved road guided by cellphone. At the road a guide told Jimenez and others to wait for a white vehicle. A gray or white van arrived and stopped on the side of the road. The group ran and entered the vehicle. The driver and front seat passenger made hand gestures for them to get and stay low while inside the vehicle. Jimenez rode for approximately three to four hours until they were apprehended by Border Patrol. She described the driver as a young white male wearing a ball cap and white t-shirt. Jimenez described the passenger as a young black male wearing a dark blue sweater and ball cap.